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April 25, 2023

Via ECF

Magistrate Judge James L. Cott
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007
(212) 805-0250

**Re: Filomeno Gaylen v. Maersk Line, Limited and Marine Engineers’
Beneficial Association, Case 1:23-cv-02501**

Dear Magistrate Judge Cott:

Defendant Maersk Line, Limited (“Defendant”) by their attorneys, Tarter Krinsky & Drogin LLP, with the consent of Plaintiff Filomeno Gaylen, by his counsel, respectfully requests to extend the time for Defendant to file an Answer or otherwise move with respect to the Amended Complaint to May 26, 2023.

In support of this Motion, Defendant states the following:

- On April 12, 2023, Plaintiff filed an Amended Complaint (ECF Doc. No. 20). The original due date for Defendant to answer or otherwise move would be May 8, 2023.
- This is the Defendant’s second request for an extension of time but first as to the Amended Complaint. The first request was granted by this Court.
- On April 21, 2023, this Court granted Defendant Marine Engineers’ Beneficial Association request for extension of time to answer or otherwise respond to the Amended Complaint to May 26, 2023.
- Plaintiff consents to this request for an extension of time.

Very truly yours,

TARTER KRINSKY & DROGIN LLP

By: /s/ Jane B. Jacobs
Jane B. Jacobs
Partner

SO ORDERED:

JAMES L. COTT
United States Magistrate Judge

cc: Counsel of Record (Via ECF)